



COMPRESSED GAS ASSOCIATION, INC.

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RPA - 2000 - 12633-1

June 6, 2000

Mr. Edward Mazzullo, Director
Office of Hazardous Materials Standards
U.S. Department of Transportation
Research and Special Programs Administration
400 7th Street SW
Washington, DC 20590

Edmonson
§ 173.314
CC-0171

Dear Mr. Mazzullo,

The Compressed Gas Association (CGA), founded in 1913, represents over two hundred member companies' world wide in the development and promotion of safety standards and safe practices in the industrial gas industry. The Association represents all facets of the industry – manufacturers, distributors, suppliers, and transporters. Through the committee system CGA creates technical specifications, safety standards, training and educational materials; and also works with government agencies to formulate responsible regulations and standards and to promote compliance with these regulations.

CGA members produce, market, and distribute industrial gases and cryogenic liquids such as acetylene, carbon dioxide, ethylene, hydrogen, nitrogen, nitrous oxide, and oxygen as well as various specialty gases, many classified as poison gases. Accordingly our members have a strong interest in domestic and international regulations governing these products.

During committee activities, CGA's Carbon Dioxide Committee noticed what appears to be an error in the Title 49 of Code of Federal Regulations (CFR) Section 173.314(c) Note 5 regarding carbon dioxide railcars. CGA requests that the Department of Transportation (DOT) revise that section of CFR to correct this error.

Section 173.314(c) states that carbon dioxide railcars should be designed so that the internal car volume does not become liquid full at 0° F. The corresponding equilibrium pressure for carbon dioxide at 0° F is 291.1 psig. The pressure regulating valves on DOT 105A500W cars are set at 350 psig and the primary safety relief valve is set for 375 psig as required in 173.314 (o). Therefore if a car is designed to go liquid full at 0° F, it will be liquid full from 291 psig (0° F) till the regulating valve setting of 350 psig is reached.

CGA does not believe that DOT intends for carbon dioxide railcars to go liquid full at pressure/temperature conditions below the pressure regulating valve settings. We propose that CFR 173.314 (c) Note 5 be changed to read as follows:

Present text: The liquid portion of the gas at -17.7 C (0° F.) must not completely fill the tank.

Proposed text: The liquid portion of the gas must not completely fill the tank prior to reaching the pressure regulating valve setting.

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Please contact me with any questions you may have or for any assistance we can provide to achieve approval of our request.

Sincerely,

COMPRESSED GAS ASSOCIATION, Inc,

A handwritten signature in cursive script that reads "Roger A. Smith".

Roger A. Smith
Technical Director

RS/rs

cc: Mr. C. Hochman - DOT
Ms. H. Mitchell - DOT
Mr. J. O'Steen - DOT
Mr. C. Johnson, President CGA